

EXHIBIT 29

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ABBY LINEBERRY, TERRY MICHAEL COOK
and MIGUEL CORDERO, individually and on
behalf of all others similarly situated,

Plaintiffs,

vs.

ADDSHOPPERS, INC., and PEET'S COFFEE,
INC.,

Defendants.

Case No. 3:23-cv-01996-VC

**DECLARATION OF MIGUEL CORDERO
IN SUPPORT OF PLAINTIFFS' MOTION
FOR CLASS CERTIFICATION**

Judge: Hon. Vince Chhabria

DECLARATION

I, Miguel Cordero, hereby attest:

1. My name is Miguel Cordero. I am over eighteen years of age and have personal knowledge of the facts contained here. If called as a witness, I could testify competently thereto.

2. I am a plaintiff in this lawsuit against AddShoppers, Inc. and Peet's Coffee, Inc. I understand that this case has been brought as a class action.

3. As a class representative, I understand I am under a duty to protect the interests of the proposed class and subclass. I will protect the interest of the members of the classes and will work with my counsel in this matter to accomplish that goal.

4. I am not aware of any facts or circumstances that would limit my ability to adequately represent the interests of the classes. I am not aware of any conflicts that would make my interests conflict with those of other class members.

5. I have not been promised any compensation for bringing this case and serving as a class representative.

6. On November 9, 2021, while in California, I visited Peet's website. I now understand that AddShoppers' tracking code was installed on Peet's website and configured to collect detailed browsing data from Peet's website visitors who viewed multiple pages, particularly those containing product information. Because I typically browse multiple pages and product listings when visiting retail websites, my visit would have triggered this data collection. It is therefore consistent with these browsing behaviors that my visit was recorded in AddShoppers' database. As explained below, I was unaware at the time that AddShoppers tracked my activity on Peet's website.

7. On June 28, 2024, I discovered a SafeOpt email to my Gmail account for the first time. Prior to this, I had not previously seen any SafeOpt emails to that email account. After discovering this connection, I submitted a request to AddShoppers on July 25, 2024, seeking information about data collected by AddShoppers connected to that account. The data I received revealed AddShoppers had been tracking my activities across many websites, including Peet's, for several years without my knowledge.

8. I understand that I am a member of the proposed class because AddShoppers collected detailed browsing activity while I visited many retail websites including Peet's. I understand that my counsel has requested a spreadsheet showing the browsing activity AddShoppers collected and as of this filing AddShoppers has not produced it.

9. I understand that I am a member of the proposed subclass because I am a resident of California.


10. I have and will continue to take actions necessary to protect the interests of the class and subclass. I have retained competent lawyers who have experience in class action litigation. I have discussed this case with my lawyers on numerous occasions. Additionally, I produced documents responsive to Defendants' discovery requests, answered interrogatories, and understand that I will be deposed soon. I am familiar with the factual and legal allegations asserts in this case and have been apprised of ongoing case developments. I will continue to stay up to date on matters pertaining to this litigation through my attorneys.

11. I am aware that there are expenses involved in this matter and have arranged with my attorneys for those expenses to be paid by my attorneys. I understand my attorneys will seek reimbursement of those expenses if a recovery is obtained.

12. I will make myself available to appear at trial for this case.

I declare under penalty of perjury the foregoing is true and correct.

Dated: January 6, 2025


Miguel Angel Cordero (Jan 6, 2025 10:34 PST)

Miguel Cordero